

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 00-6310-CR-FERGUSON

UNITED STATES OF AMERICA, :

Plaintiff, :

v. :

MICHELE REID, :

Defendant. :

_____ :

UNOPPOSED MOTION FOR ROLE ADJUSTMENT

Defendant, Michele Reid, through counsel, respectfully asks this Court to grant a two level downward adjustment in her offense level to reflect that she played a minor role in this offense, in accordance with the terms of the plea agreement entered into by the parties in this case, and in support states as follows:

1. On October 14, 2000, Defendant entered a guilty plea to Count One of the two count indictment in this matter. As a part of the written plea agreement signed by the parties, the government agreed not to oppose the Defendant's request for a two level reduction for minor role, in recognition of Ms. Reid's role as a courier.
2. Ms. Reid has provided a written statement to the probation officer and a separate safety valve statement to the government describing her involvement, and the involvement of others in this importation.
3. The facts support the parties' agreement that Ms. Reid played a minor role. She was

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recruited by others to act as a courier to effect the importation of a relatively small amount of cocaine into this country. She had no ownership interest or decision-making authority, did not plan the importation, and was to play no role in distribution of the cocaine once it was delivered to the contact in South Florida. She was supposed be compensated for her role as a courier upon delivery.


4. These facts support a two level reduction for minor role as contemplated by § 3B1.2 of the Sentencing Guidelines and its Commentary, and as outlined in the applicable case law. See United States v. Veloza, 83 F.3d 380, 382 (11th Cir. 1996); United States v. De Varon, 175 F.3d 930 (11th Cir. 1999) (*en banc*).

5. As stated above, pursuant to the terms of the written plea agreement, the government has no objection to the granting of the relief requested herein.

Accordingly, for all the above reasons, Defendant respectfully asks this Court to honor the factually supported agreement of the parties and to reduce her adjusted offense level by two levels, from a level 21 to a level 19, with a resulting guideline range of 30-37 months.

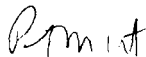
Respectfully submitted,

KATHLEEN M. WILLIAMS
FEDERAL PUBLIC DEFENDER

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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the aforementioned motion was mailed on this 22nd day of March, 2001, to Assistant United States Attorney Jeff Kay, 299 E. Broward Blvd., Ft. Lauderdale, FL 33301 and to United States Probation Officer Julia Hyle, 300 N.E. 1st Avenue, #315, Miami, Florida, 33132.



Patrick M. Hunt